

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CATALINA CLARA, )  
                        )  
Plaintiff,           )                      Case No. 15-cv-9192  
v.                     )  
                        )                      District Judge Hon. John W. Darrah  
KEY CLUB III, INC. d/b/a KEY CLUB    )  
CLEANERS,            )  
                        )  
Defendants.          )

**STIPULATION OF DISMISSAL AND APPROVAL OF SETTLEMENT**

Plaintiff, CATALINA CLARA, and Defendant, KEY CLUB III, INC., being all the parties who have appeared in this action, having entered into a settlement agreement, hereby stipulate, by and through their respective attorneys of record, to the dismissal of the instant lawsuit and without an award of costs of attorneys' fees to any party. The parties jointly move this Honorable Court to approve the settlement as fair, reasonable and in the best interest of all parties. Plaintiff knowingly and voluntarily entered the settlement agreement after being fully informed of all of her rights under the FLSA and the IMWL, the issues of proof and the defense position of Defendants. Because the terms of the settlement are confidential, should the Court require review of the agreement, the parties request that they be permitted to submit the agreement to the Court at the hearing or to file the agreement under seal. The parties request that an order be entered dismissing this case *without* prejudice and without an award of costs or attorneys' fees to any party. On December 1, 2016, absent a motion by either party to enforce the settlement agreement, the dismissal of this matter shall convert automatically *with prejudice*.

Dated: July 19, 2016

Respectfully submitted,

**CATALINA CLARA**

**KEY CLUB III, INC.**

By: /s/ Susan J. Best  
One of her attorneys

Susan J. Best  
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By: /s/ Peter C. Kim  
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